## SEAWAVE, LLC CERTIFICATION OF CPNI FILING (FEBRUARY 6, 2006) EB-06-TC-060 EB-06-36

I, Rhonda Landers, CFO and Vice President of Business Development for SeaWave, LLC ("SeaWave"), do hereby certify that SeaWave has established operating procedures to ensure compliance with 47 C.F.R. § 64,2009 concerning safeguards for the use of customer proprietary network information ("CPNI").

Attached hereto is a copy of ScaWave's policy for ensuring protection of CPNI.

Rhonda Landers

February 6, 2006

## SEAWAVE, LLC CUSTOMER PROPRIETARY NETWORK INFORMATION COMPLIANCE POLICY

SeaWave, LLC ("SeaWave") has established the following procedures for safeguarding the use of customer proprietary network information ("CPNI"), as required by 47 C.F.R. § 64.2009:

- 1. SeaWave uses CPNI for the purpose of fulfilling customer requests for products and services, improving its services, contacting customers, and conducting research.

  SeaWave shall not provide any third party with access to any customer's CPNI without first obtaining the customer's written consent. Notwithstanding the foregoing, SeaWave may provide a third party with access to a customer's CPNI without first obtaining the customer's written consent (a) in the event that a third party makes a request pursuant to a lawfully issued search warrant, subpoena, or court order, (b) to establish or exercise SeaWave's legal rights or defend against legal claims, or (c) in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of SeaWave's terms of use, or as otherwise required by law. In addition, it is the current practice of SeaWave to share CPNI with partners who perform billing services on SeaWave's behalf and who have agreed in writing to only use such information in an aggregate form for internal business purposes.
- 2. In the event that SeaWave receives a request for CPNI, SeaWave shall first verify the name, social security number, date of birth, driver's license number, state of license, and account password of the requesting party to confirm that the requesting party is the customer to whose account the request relates.

- 3. SeaWave shall train all personnel on ensuring protection of CPNI and maintain written confirmation that all personnel have received such training. SeaWave shall also implement a disciplinary policy for unauthorized use of CPNI by SeaWave personnel.
- 4. It is not the current practice of SeaWave to engage in any sales or marketing activities that would involve the use of CPNI. In the event that SeaWave engages in such activities in the future, SeaWave will ensure compliance with 47 C.F.R. § 64.2009(c), (d), and (f).